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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JUDGE DER-YEGHIAYAN

FILED

JUL X 8 2008

MAGISTRATE JUDGE JEFFREY COLE  
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA

) 08 CR 374

v.

) Violations: Title 18,

) United States Code,

VIKTORIJA MALUKAITE

) Sections 2113(a),

AHMAD ALI AHMAD,

) 924(c) and 2.

NADER ZEIDAN, and

RAMI JAFILAN

) MAGISTRATE JUDGE NOLAN

COUNT ONE

The SPECIAL FEBRUARY 2008-1 GRAND JURY charges:

On or about May 6, 2008, at Palos Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

VIKTORIJA MALUKAITE,  
AHMAD ALI AHMAD,  
NADER ZEIDAN, and  
RAMI JAFILAN,

defendants herein, did by force and violence, and intimidation, take from the person and presence of bank employees at TCF Bank, 6410 West 127<sup>th</sup> Street, Palos Heights, Illinois, approximately \$167,000 in United States Currency belonging to and in the care, custody, control, management, and possession of TCF Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT TWO

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about May 6, 2008, at Palos Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

RAMI JAFILAN, and  
AHMAD ALI AHMAD,

defendants herein, knowingly possessed a firearm, namely a handgun, in furtherance of, and used, carried, and brandished that firearm during, and in relation to, a crime of violence for which they may be prosecuted in a court of the United States, namely, bank robbery, in violation of Title 18, United States Code, Sections 2113(a) and 2, as more fully set forth in Count One of this indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**FORFEITURE ALLEGATION**

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations contained in Count One of this Indictment are realleged and incorporated here by reference as if fully restated herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c).

2. As a result of their violation of Title 18, United States Code, Section 2113(a), as alleged in this Indictment,

VIKTORIJA MALUKAITE,  
AHMAD ALI AHMAD,  
NADER ZEIDAN, and  
RAMI JAFILAN,

defendants herein, have subjected to forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c), the following property and interests:

a. All property constituting, and derived from, and traceable to, proceeds obtained, directly or indirectly, as a result of the defendants' violation of Title 18, United States Code, Section 2113.

b. All property that is used to facilitate, and is intended to be used to facilitate the commission of the defendants' violation of Title 18, United States Code, Section 2113.

3. The interests of the defendants subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c), include, but are not limited to approximately \$167,000 in United

States Currency.

4. If any of the property or funds described above as a result of any act or omission of the defendants:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty;

It is the intent of the United States, pursuant to provisions of Title 21, United States Code 853(p) to seek forfeiture of substitute property belonging to the defendants;

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY